

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

|        |                             |   |                        |
|--------|-----------------------------|---|------------------------|
| IN RE: | RICHARD C. LONG, JR. and    | : | CHAPTER 13             |
|        | CHRISTINE V. LONG           | : |                        |
|        | Debtor(s)                   | : |                        |
|        |                             | : |                        |
|        | CHARLES J. DEHART, III      | : |                        |
|        | STANDING CHAPTER 13 TRUSTEE | : |                        |
|        | Movant                      | : |                        |
|        |                             | : |                        |
|        | vs.                         | : |                        |
|        |                             | : |                        |
|        | RICHARD C. LONG, JR. and    | : |                        |
|        | CHRISTINE V. LONG           | : |                        |
|        | Respondent(s)               | : | CASE NO. 1-17-bk-05073 |

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 25th day of January, 2018, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. Debtor(s)' plan violates 11 U.S.C. Sec. 1322(a)(1) in that the debtor(s) has not submitted all or such portion of the disposable income to the Trustee as required. More specifically,

Trustee alleges and avers that debtor(s)' disposable income is greater than that which is committed to the plan based upon the Means Test calculation and specifically disputes the following amounts:

- a. Retirement loan (verification) – Line 41.
- b. Plan payment calculation sum of Lines 34, 35, 36 45.

2. The Trustee avers that debtor(s)' plan is not feasible based upon the following:

- a. The plan is underfunded relative to claims to be paid – 100% plan.

3. Trustee avers that debtor(s)' plan is not feasible and cannot be administered due to the lack of the following:

- a. 2017 Federal Income Tax return.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Charles J. DeHart, III  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 8th day of February, 2018, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Stephen Wade Parker, Esquire  
230 York Street  
Hanover, PA 17331

/s/Deborah A. Behney  
Office of Charles J. DeHart, III  
Standing Chapter 13 Trustee